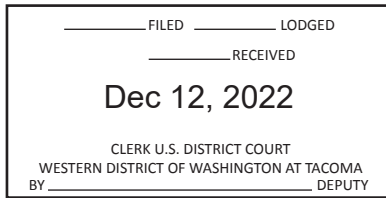


Chief Magistrate Judge J. Richard Creatura



UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARK LEONETTI,

Defendant.

CASE NO. MJ22-5290

COMPLAINT for VIOLATIONS

Title 18, U.S.C. Section 875(c)

BEFORE, The Honorable J. Richard Creatura, Chief Magistrate Judge, U.S.
Courthouse, Tacoma, Washington.

The undersigned complainant being duly sworn states:

COUNT 1
(Interstate Threat)

On or about September 2, 2022, in Cowlitz County, within the Western District of
Washington, and elsewhere, MARK LEONETTI knowingly transmitted in interstate and
foreign commerce, from the State of Washington to another state, for the purpose of
issuing a threat and with knowledge that the communication would be viewed as a threat,

1 a communication, that is, a voicemail that contained the following threat to injure U.S.
2 Representative 1:

3 “I’m going to murder you f***** for going the wrong way on Rochester with
4 whatever Rochester f***** you’re with.”
5

6 All in violation of Title 18, United States Code, Section 875(c).
7

8 **COUNT 2**

9 **(Interstate Threat)**

10 On or about September 23, 2022, in Cowlitz County, within the Western District
11 of Washington, and elsewhere, MARK LEONETTI knowingly transmitted in interstate
12 and foreign commerce, from the State of Washington to another state, for the purpose of
13 issuing a threat and with knowledge that the communication would be viewed as a threat,
14 a communication, that is, a voicemail that contained the following threat to injure U.S.

15 Senator 1:

16 “Well, so I’m gonna murder you. It is justified.”
17

18 All in violation of Title 18, United States Code, Section 875(c).
19

20 **COUNT 3**

21 **(Interstate Threat)**

22 On or about September 23, 2022, in Cowlitz County, within the Western District
23 of Washington, and elsewhere, MARK LEONETTI knowingly transmitted in interstate
24 and foreign commerce, from the State of Washington to another state, for the purpose of
25 issuing a threat and with knowledge that the communication would be viewed as a threat,
26 a communication, that is, a voicemail that contained the following threat to injure U.S.

27 Senator 1:
28

1 “Stupid dead whore. You called the locals. You called. Okay. Wasn’t [U.S. House
 2 Representative 1], [U.S. House Representative 1] did? Too bad it wasn’t you. We’d have
 3 followed you. We’d have followed them right back to Minnesota. ... Are you sure it
 4 wasn’t you? Please be you bitch. Please be. You stupid Jew meat bitch. ... Please have
 5 been you [U.S. Senator 1]. ... So I hope it was you. Bye-bye, adios if it was. And I bet
 6 you delicious g*** meat.”
 7

8 All in violation of Title 18, United States Code, Section 875(c).
 9

10 **COUNT 4**

11 **(Interstate Threat)**

12 On or about September 23, 2022, in Cowlitz County, within the Western District
 13 of Washington, and elsewhere, MARK LEONETTI knowingly transmitted in interstate
 14 and foreign commerce, from the State of Washington to another state, for the purpose of
 15 issuing a threat and with knowledge that the communication would be viewed as a threat,
 16 a communication, that is, a voicemail that contained the following threat to injure U.S.
 17 Senator 1:
 18

19 “Now even if you are delusional when we murder you, you don’t have to sober up
 20 to that. We’re just gonna murder you here bitch. The barbecue. Go ahead. You already
 21 been delusional all this much of your life, right? But when we barbecue you, maybe you
 22 will have been too. Maybe it makes you sushi.”
 23

24 All in violation of Title 18, United States Code, Section 875(c).
 25

26 **COUNT 5**

27 **(Interstate Threat)**

28 On or about October 19, 2022, in Cowlitz County, within the Western District of
 Washington, and elsewhere, MARK LEONETTI knowingly transmitted in interstate and

1 foreign commerce, from the State of Washington to another state, for the purpose of
2 issuing a threat and with knowledge that the communication would be viewed as a threat,
3 a communication, that is, a voicemail that contained the following threat to injure U.S.

4 Senator 2:

5 “And what do we do to you with you there? ... We peel you, inside out, it’s called
6 a ... Fort Vancouver lollipop, and you eat the meat off the inside, and they can come and
7 fart and piss and shit on itself, all over its face, at the same time, right?”

8 All in violation of Title 18, United States Code, Section 875(c).
9

10
11 **COUNT 6**

12 **(Interstate Threat)**

13 On or about October 26, 2022, in Cowlitz County, within the Western District of
14 Washington, and elsewhere, MARK LEONETTI knowingly transmitted in interstate and
15 foreign commerce, from the State of Washington to another state, for the purpose of
16 issuing a threat and with knowledge that the communication would be viewed as a threat,
17 a communication, that is, a voicemail that contained the following threat to injure U.S.

18 Representative 2:

19 “Jew mouth. Jew blood. We need to get you back to Israel so we can kill you
20 there.”

21 All in violation of Title 18, United States Code, Section 875(c).
22

23
24 **COUNT 7**

25 **(Interstate Threat)**

26 On or about October 26, 2022, in Cowlitz County, within the Western District of
27 Washington, and elsewhere, MARK LEONETTI knowingly transmitted in interstate and
28 foreign commerce, from the State of Washington to another state, for the purpose of

1 issuing a threat and with knowledge that the communication would be viewed as a threat,
2 a communication, that is, a voicemail that contained the following threat to injure U.S.

3 Representative 2:

4 “So Leonettis have always killed [U.S. Representative 2’s last name]s before, and
5 it has never had anything to do with the Holocaust. ... Since before the Holocaust,
6 Leonettis have always killed [U.S. Representative 2’s last name]s and Schulzes. That’s
7 why it’s not déjà vu for you now, either maybe, f*****.”
8

9 All in violation of Title 18, United States Code, Section 875(c).
10

11 I, Benjamin Long, being first duly sworn on oath, depose and say:

12 **INTRODUCTION AND AFFIANT BACKGROUND**

13 1. I am employed as a Special Agent (SA) with the Federal Bureau of
14 Investigation, and have been so employed since 2012. I am currently assigned to the
15 Vancouver Resident Agency of Seattle FBI. While employed by the FBI, I have
16 investigated federal criminal violations related to high technology or cybercrime, child
17 exploitation, drug trafficking, counter-terrorism and violent crimes including cases
18 involving threats of violence.
19

20 2. This application in support of this complaint is based on information I have
21 gained from my own investigation, personal observations, training, and experience, as
22 well as information related to me by other detectives, police officers, and/or federal
23 agents through oral and written reports. Further, I have reviewed and am familiar with
24 the investigative file in this matter. I have not included every fact concerning this
25 investigation. Rather, I have set forth the facts that I believe are necessary for a fair
26 determination of probable cause.
27
28

SUMMARY OF PROBABLE CAUSE

3. On March 2, 2021, at approximately 1357 hours, staff for U.S. Senator 1's¹ office notified the United States Capitol Police (USCP) Threat Assessment Section (TAS) about a voice message from a phone number ending in -5817. The voicemail contained the statements: "If [U.S. Senator 3] is delusional. Am I here to kill [U.S. Senator 3] because I'm clinical. No, I'm not clinical. If [U.S. Senator 3] is delusional and I'm still here to kill him, I'm not clinical. [U.S. Senator 3] is delusional. I'm here to kill him for some reason related to ... [incomprehensible]." A USCP Special Agent obtained information from AT&T Corporation (AT&T) that the subscriber for the phone number ending in -5817 was named "Mark Leonetti" and had an address in Portland, Oregon. Call logs received from AT&T further confirmed that phone calls had been made from the number ending in -5817 to U.S. Senator 1's office. According to AT&T, the phone call was made at a time when the phone was in the vicinity of coordinates describing a location near 285 19th Avenue, Longview, WA.

4. The USCP subsequently contacted the Vancouver Resident Agency of FBI Seattle to request investigative assistance. The FBI and USCP located an individual named Mark LEONETTI residing in Longview, WA, with an address in public records searches listed as 283 19th Avenue, Longview, WA.

5. The FBI subsequently contacted a detective in Washington County, Oregon, where LEONETTI was listed as having previously resided. The detective related that according to local law enforcement records, in June 2020, Washington County Behavioral Health workers had gone to LEONETTI's residence in Oregon after a call came in. LEONETTI tried to record the contact using his phone when law

¹ The names of the victim political officials have been anonymized in this complaint.

1 enforcement contacted him. The detective also conveyed that Washington County's
2 Behavioral Health team had stated or noted that LEONETTI is paranoid schizophrenic.

3 6. During an initial follow-up interview with myself and Longview Police
4 Department officers, LEONETTI denied making any phone calls to any U.S. Senators or
5 making threats. He also acted erratically, including running back into his residence to
6 retrieve his cell phone, which he held on his shoulder during the interview while stating
7 he had "Russia" on the line. LEONETTI did, however, confirm his phone number was
8 971-998-5817. When asked if he intended to harm or kill U.S. Senator 3, he responded
9 nonsensically, but then said "only if justified." Based on my familiarity with
10 LEONETTI's voice from this interview, I recognize his voice as the speaker leaving the
11 voicemails transcribed below.
12

13 7. During the rest of 2021, LEONETTI went on to leave over 400 voicemails
14 at the office phone numbers for numerous U.S. Senators and Representatives of both
15 political parties. In one such voicemail, LEONETTI, apparently referencing my visit in
16 March, stated that "potentially ... someone has been listening to [U.S. Senator 1]'s
17 messages because they sent an FBI f***** out." He went on to make statements about
18 U.S. Senator 3's death.
19

20 8. On September 2, 2022, LEONETTI left seven voicemails in the voicemail
21 box of a phone number for U.S. Representative 1's office. Among those voicemails were
22 two that I have attempted to transcribe below, with each call in a separate subparagraph.
23 The transcriptions may not be perfect, because some of the terms are not clearly spoken; I
24 may therefore alter my view of what was said after listening to the voicemails again at a
25 later time. Although I have marked certain portions as "[incomprehensible]" or
26 "[unknown]" at this point, the words spoken by LEONETTI may be comprehensible to
27 me after further playback or using other tools.
28

1 a. Okay, so the reason I'm going to murder and barbecue the Capitol
2 Police then, because you're [incomprehensible] you dead f*****! U.S. the state
3 side, State Department f*****. And you're doing it in politics, in partisan
4 American domestic politics. You need to get U.S. Department of State state side
5 for f*****. **So we're going to barbecue your ass. We're going to peel your ass**
6 **inside out.** You stupid cum-sucking g*** race. And at the end of the day, the
7 Eugene, Oregon BLMs are the bigger colonialists than your MAGAs are anyway.
8 I understand it's a personal score for you after January 6th, you f*****. But
9 they're still, even those MAGAs from January 6th of 2021 aren't the colonialists
10 that a Eugene BLM is. And you didn't think of it first! You didn't think of
11 militarizing the DOJ first anyway! The guy that thought of doing it against the
12 bigger colonialists thought of it already, too!

14 b. It's that Kissinger that's laughing at you dead g*** meats, because
15 he did call it. It's the Rochester you don't make. The only Rochester you would
16 get to get in on, and we wouldn't need these shit f***** like the Capitol Police
17 for anyway. Nope. By statute, by any other, right, by any other fucking measure
18 either, you don't need f***** g***s, misfits like your fucking g*** asses for one,
19 for this or Rochester ever possibly, g*** fucking f***** race. Now what
20 Rochester did you pick up if you're not supposed to be associating with
21 [incomprehensible]? And they want to call themselves professionals still, right?
22 Wait a minute. What g*** [incomprehensible]. How many do you have? Look at
23 all the tin badges you have. 'Cause it's the wrong one. You go after the MAGAs
24 before you go after the Eugene, Oregon BLMs that way. And it's the wrong move
25 and the [incomprehensible] is in Rochester. I'm not here to defend the MAGAs.
26 **I'm going to murder you f***** for going the wrong way on Rochester with**
27 **whatever Rochester f***** you're with.**
28

1 9. In the other voicemails, which were not always coherent, LEONETTI made
2 other references to “murder[.]” or “kill[ing].”

3 10. USCP obtained call records and location information for September 2, 2022
4 from AT&T for the phone number ending in -5817. The phone toll records show that the
5 user of the -5817 phone number had called the office of U.S. Representative 1 on nine
6 occasions between 11:54 PM PT on September 1, 2022 and 12:22 AM PT on September
7 2, 2022, and most recorded location information was within the vicinity of LEONETTI’s
8 residence.
9

10 11. After these voicemails, on a date between September 12 and 15, 2022,
11 LEONETTI was again contacted, this time by emergency mental health workers, at the
12 request of the Longview Police Department. Two police officers accompanied the EMH
13 workers. One of the EMH workers reported that, during her conversation with
14 LEONETTI, she informed him that his voicemails were threatening; he did not deny as
15 much. He denied owning a firearm but claimed to possess other weapons. He denied any
16 intent to go to D.C. or harm others. LEONETTI also made other statements during this
17 conversation that were nonsensical.
18

19 12. Between September 23 and 25, 2022, LEONETTI left 32 voicemails in the
20 voicemail box of a phone number for U.S. Senator 1’s office. My rough transcription of
21 three of those calls are below, with each call in a separate subparagraph. The same
22 caveats noted above about my transcriptions apply to all transcriptions below. In these
23 voicemails, LEONETTI appears to refer several times to his visit, two weeks earlier,
24 from the EMH workers with Longview Police Department officers.

25 a. So they said “she.” They gave up “she.” Does that leave what, does
26 that leave Feinstein this time? If it doesn’t leave [U.S. Representative 1]. Maybe it
27 was [U.S. Representative 1] instead of you, you filthy f***** fucking g*** race
28 whore. **Well, so I’m gonna murder you. It is justified.** You go ahead, you

1 circumvent the feds again whore! When you do forget to tell them he might be the
2 von Braun murderer already! Again, justified murder!

3 b. Now, dead, dead g*** meat. Uh, we're gonna follow, we're gonna
4 murder the Longview Police f***** right back to you. Guess how? Guess who
5 rips already with both [unknown] and [unknown]. Stupid dead whore. You called
6 the locals. You called. Okay. Wasn't [U.S. Representative 1], [U.S. Representative
7 1] did? Too bad it wasn't you. We'd have followed you. We'd have followed them
8 right back to Minnesota. You sure it wasn't you and Jesse Ventura stuff you called
9 the locals about in a Charles Turner, uh, Weekend at Bernie's. **Are you sure it**
10 **wasn't you? Please be you bitch. Please be.** You stupid Jew meat bitch. Jew
11 meat? I mean, coincidentally, it's American Karen, maybe Adam made you to be
12 as big a Karen as you are K Sax fucking princess. Please have been you [U.S.
13 Senator 1]. Uh, that rep, the Longview Police f***** you did try to alert are
14 already with [unknown] and [unknown]. In a, bitch, in a Weekend at Bernie's
15 Charles Turner. **Okay? So I hope it was you. Bye-bye, adios if it was.** And I
16 [bet/get] you delicious g*** meat. Yeah Jew meat or not g*** meat, you know,
17 that's [incomprehensible]. However retarded it is! Rip is a fugitive. "You know
18 you can't murder retards!" Oh yeah, you can't. Fugitive delusionals! It's a
19 fugitive, fucking delusional! But they're in contempt 'cause every last one of them
20 is a Rajneeshee [incomprehensible] ring and a von Braun g***. They are a von
21 Braun Nazi American fucking joke. Okay? So, like it or not Jew bitch.

22 c. Here I am killing Joe because he's a von Braun, a von Braun
23 hypocrite. He is a von Braun hypocrite. Weekend at Bernie's included, otherwise
24 just a American foreign policy hypocrite. Geneva Convention, American foreign
25 policy hypocrite. Okay, well you wanna know why, why I was killing Joe? It's
26 'cause he was just fighting for things like, [incomprehensible], but I'm a denier so
27
28

1 I can't admit it at the same time. Because you are a Hiroshima fucking denier Jew.
 2 Hiroshima denier Jew. The von Braun, von Braun, Hiroshima denier Jew whore. K
 3 Sax Jew whore. F*****. West German Jew. Yeah. Yeah. Now even if you are
 4 delusional when we murder you, you don't have to sober up to that. **We're just**
 5 **gonna murder you here bitch. The barbecue. Go ahead. You already been**
 6 **delusional all this much of your life, right? But when we barbecue you, maybe**
 7 **you will have been too. Maybe it makes you sushi.** Maybe you'll be like
 8 [unknown] for it.
 9

10 13. That these phone calls referred to the Longview Police Department and
 11 accused U.S. Senator 1 of having "called the locals." just days after LEONETTI was
 12 visited by EMH workers in coordination with Longview police officers and in response
 13 to voicemails left at another politician's office, also circumstantially establishes that these
 14 voicemails were left by LEONETTI with the purpose of threatening or with the
 15 knowledge they would be perceived as threatening.

16 14. From October 15-19, 2022, Leonetti left seven voicemails in the voicemail
 17 box of a phone number for U.S. Senator 2's office. My rough transcription of one of
 18 those calls is below.

19 a. Okay so they wanted the Jew bred out of you before they
 20 barbecued you, without your being in office. That's what they want you
 21 holding public office. That might be the January 6th on you, there could be
 22 a ton of them. Maybe Hatfield is, maybe Gordon is, maybe just Muriel
 23 Bowser, not in a state, Muriel Bowser of the mayor's office is. Where are
 24 you trying to work out of right now? Is DOJ there with you? How about
 25 Muriel Bowser? She is still too, yes DOJ, for the duration of it, till you're
 26 barbecued brother. I get. Is that Capitol Police jurisdiction? No, not what
 27 they caught you in, [U.S. Senator 2], no. Now it's also Charles Turner
 28

statute, if you got it from the wrong Mark Hatfield, especially via Gordon Smith. You hear about that? Is that the Tualatin Valley fire and rescue firehouse we murdered all you f***** at? Out of? You tried to occupy it. **And what do we do to you with you there? That's why we do that. We peel you, inside out, it's called a Fort Vanc—cause you must not be from town, it's a Fort Vancouver lollipop, and you eat the meat off the inside, and they can come and fart and piss and shit on itself, all over its face, at the same time, and get it right?** It's real Fort Vanc, Fort Vancouver lollipop, f*****, yeah. I don't know if that's the Hollywood lollipop guilds, are calling you, that's what Fort Vancouver calls you. Maybe that's the difference between us and them, maybe they're calling you the same thing we are, partner. I don't know. Do you know it had to do with Hollywood? 'Cause then from there it's to the [incomprehensible] American oligarch. I'm not with the Russians. Those fight club American oligarchy and a few other things. Uh, I get out of the Russians' way because it's also the American oligarchy, and [Cruz/Cruise], and he's the known propagandist too. And he might have tried to run to Ukraine. Was he running from the Russians to Ukraine, instead of from me there, we don't know. Or do you, you know? It's both of them, they weren't even working [incomprehensible] each other. What explains to the fire, [cuts out] here's why the feds are gonna make sure you get fucking barbecued right, what's left of you, [U.S. Senator 2]. What did you set Biden up for? What did you set Biden up for this week?

15. On October 26, 2022, Leonetti left four voicemails in the voicemail box of a phone number for U.S. Representative 2's office. My rough transcription of two of those calls is below, with each call in a separate subparagraph:


1 a. So you, you aren't then a greaseball Hitlerini, because you're
2 a Jew. Because you're a Hitler Jew. Hitlerini Jew or whatever. So
3 technically you're not Iranian enough to be Hitlerini. You little Hitler Jew,
4 yeah he's a little Hitler Jew, to [incomprehensible] to be Hitler Jew, you
5 mean. You gotta [incomprehensible] was the Hatfield Rajneeshee.
6 Hatfield Democrat Rajneeshee. If Kissinger's signing off on it, it's not
7 clinical, neither is Kinskey. If not, we can definitely notarize that, you Jew
8 blood idiot, obviously you played right into it. **Jew mouth. Jew blood.**
9 **We need to get you back to Israel so we can kill you there,** otherwise
10 someone [incomprehensible] will beat us to it, because there's plenty of
11 statutes that apply to you by now. You worthless fucking Jew mouth. Why
12 aren't you a Hitlerini, then? You think you're gonna suck off Schulz, and
13 not be a Hitlerini? Wait, your Schulz is Hitlerini. I've found out which
14 Hitlerini she is, if she's a Hitlerini you must be. You won't
15 [incomprehensible] "I can't! I'm a Jew capo! You can't call me a Hitlerini.
16 I'm the Jew capo sucking off Schulz. You thought Zelensky was. Well,
17 what does that make [U.S. Representative 2]?"

19 b. **So Leonettis have always killed [U.S. Representative 2's**
20 **last name]s before, and it has never had anything to do with the**
21 **Holocaust.** In fact, even through it when [U.S. Representative 2's last
22 name]s were sucking off Shulzes, and Leonettis were killing Schulzes, too.
23 **Since before the Holocaust, Leonettis have always killed [U.S.**
24 **Representative 2's last name]s and Schulzes. That's why it's not déjà**
25 **vu for you now, either maybe, f*****.**

27 16. The earliest calls from LEONETTI's -5817 phone number to a political
28 official in 2021 that I am aware of occurred in February 2021, to U.S. Representative 2's

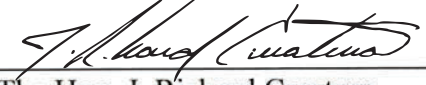
1 office. The latest calls from that phone number occurred just one week ago, on
2 December 5, 2022, to U.S. Senator 4's office. The latest calls included additional
3 statements about "murder" and "kill[ing]" individuals.

4 17. Based on the above facts, I respectfully submit that there is probable cause
5 to believe that Mark LEONETTI committed the offenses alleged in this Complaint.
6

7
8 
9 _____
10 Benjamin Long, Complainant
11 Special Agent
12 Federal Bureau of Investigation

13 Based on the Complaint and Affidavit sworn to before me, and subscribed in my
14 presence, the Court hereby finds that there is probable cause to believe the defendant
15 committed the offenses set forth in the Complaint.

16 Dated this 12th day of December, 2022.
17

18 
19 _____
20 The Hon. J. Richard Creatura
21 Chief United States Magistrate Judge
22
23
24
25
26
27
28